

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

UNITED STATES OF AMERICA

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v.

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* CRIMINAL NO. 1:15CR65LG-RHW

MIKAL C. WATTS, et al.

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**AGREED MOTION TO PERMIT LOGISTICAL ACCOMMODATIONS
FOR TRIAL TEAM STAFFS**

The parties file this agreed motion to permit logistical accommodations for their trial team staffs. The U.S. Marshalls have informed movants that they require an order from this Court to permit the following:

1. laptops and cell phones;
2. Wi-Fi or VPN capability to enable database access;
3. A printer in the courthouse, to permit printing of documents needed;
4. Bottled water; and
5. Dietary snacks for one support staff member who is diabetic.

**I. LAPTOPS & WI-FI/VPN ACCESS TO INTERNET TO RETRIEVE
DATABASED DOCUMENTS AND A PRINTER TO PRESENT THEM**

This is a case involving several terabytes of documentation, and potentially several hundred witnesses. Permitting defendants, defense counsel, and members of the parties' trial team staffs to enter the courthouse and the courtroom with laptops and Wi-Fi or VPN capability to enable their access to documents stored on databases is essential to the efficient conduct of this trial, and permitting the parties to bring a printer into the courthouse will enable them to print documents needed on a short-term basis.

II. PERMITTING CELL PHONES WILL FACILITATE THE EFFICIENT FLOW OF AVAILABLE WITNESSES

The current policy is to permit defense counsel to enter the courthouse with cell phones, but not others. Permitting defendants and members of the parties' trial team staffs to enter the courthouse and the courtroom with cell phones will assist the parties to ensure the continuous flow of available witnesses, rather than having them leave the courthouse to call upcoming witnesses.

III. BOTTLED WATER

This trial is scheduled to last 6-8 weeks. The parties respectfully request that the order permit them to bring only bottled water into the courthouse. Such an accommodation will give the litigants the ability to quench their thirst without creating a cleanliness issue. Additionally, because of a recent surgery, Attorney Ramiro Orozco requests that he be allowed access to water during trial. The parties commit to the court that bottles will not be kept on counsel table unless the court authorizes otherwise, and all empty bottled water containers will be retrieved and removed each day.

IV. NUTS & SNACKS FOR A DIABETIC STAFF MEMBER

One of Mikal Watts' staff members, his paralegal, is a diabetic. She respectfully requests that the Court permit her to bring into the courthouse pre-packaged snacks and jarred nuts, so that if a health need arises during court, she may properly ingest such necessary foods outside the courtroom without having to leave the court house to do so.

V. TRIAL GRAPHICS PRESENTATION

Several of the Defendants have retained Keith Cartwright of Courtroom Concepts, Inc. to run trial graphics presentation software in order to display documents and graphics to the jury.

The parties request that Mr. Cartwright be permitted to enter the courtroom and set up his equipment in front of the bar and adjacent to counsel table, even though he is not a lawyer.

VI. MEMBERS OF THE TRIAL TEAMS WHO ARE NOT LAWYERS FOR WHOM THIS MOTION REQUESTS COMPUTER, WI-FI/VPN & CELL PHONE ENTRY PERMISSION

Mikal Watts will have non-lawyers Cindy Wilson, Meredith Drukker and Oscar Quiroz assisting him during this trial. Michael McCrum, counsel for David Watts, will have non-lawyers Priscilla Torres, Teri Watts and Alicen Flores, assisting him during trial. Chip Lewis, Alicia O’Neil and Tommy Spina, counsel for Hector Eloy Guerra will have no non-lawyers assisting them during trial. Karl C. Hightower, counsel for Wynter Lee, will have no non-lawyer assisting him during trial. Luke D. Wilson, counsel for Gregory P. Warren, will have no non-lawyer assisting him during trial. John W. Weber, counsel for Thi Houng (“Kristy”) Le, will have non-lawyer Demetrius Drakeford assisting him during trial. Ramiro Orozco, counsel for Thi Hoang (“Abbie”) Nguyen, will have non-lawyers Kent Aldenderfer and Logan Luquette assisting him during trial. Jerry L. Rushing and Gregg Kennedy, Assistant United States Attorneys, will have no non-lawyers assisting them during trial. The parties respectfully move this Court to order the U.S. Marshal’s Service and courtroom security officers to permit those non-lawyers to bring into the courthouse their computers, Wi-Fi/VPN devices and their cell phones.

Respectfully submitted this the 24th day of June, 2016.

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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2016, I electronically filed the foregoing with the Clerk of Court using the ECF system, which sent notification of such filing to all counsel of record.

s/Mikal C. Watts
Mikal C. Watts